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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

No. 08-01789 (BRL)

SIPA LIQUIDATION

(Substantively Consolidated)

**CUSTOMERS' JOINDER IN CLAIMANTS' OMNIBUS
OPPOSITION TO THE TRUSTEE'S MOTION AFFIRMING
APPLICATION OF NET INVESTMENT METHOD TO DETERMINATION
OF CUSTOMER TRANSFERS BETWEEN BLMIS ACCOUNTS**

Various customers of Bernard L. Madoff Securities LLC (“BLMIS”) for whom Lax & Neville LLP filed SIPC Claim forms and/or Oppositions to The Trustee’s Determination¹ (“Customers”) join in the Claimants’ Omnibus Opposition to the Trustee’s Motion Affirming Application of Net Investment Method To Determination Of Customer Transfers Between BLMIS Accounts, dated May 16, 2014 (the “Opposition”).

On December 11, 2008, Bernard Madoff’s Ponzi scheme was revealed, and it became clear that the assets in various customers’ accounts did not exist. Some of the customers subsequently filed claims with the Trustee in connection with the liquidation of BLMIS (the “Customer Claims”). The Trustee denied the Various Customers’ Claims.

The Customers oppose the Trustee’s Motion for the applicable reasons stated in the Opposition, including, but not limited to the memorandum of law filed by Millberg LLP and Seeger Weiss LLP, on behalf of other BLMIS customers. For the reasons detailed in the Opposition, the Customers respectfully submit that this Court should deny the Trustee’s motion.

Dated: New York, New York
May 16, 2014

LAX & NEVILLE, LLP

By: /s/ Barry R. Lax
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¹ Lax & Neville LLP intends on filing an Addendum to this Joinder Motion outlining the Customer Claimant’s name, the applicable BLMIS account number, the SIPC Claim Number and the Docket Number of the Objection to the Trustee’s Claim Determination.

ADDENDUM TO MOTION TO JOIN

In re Bernard L. Madoff Investment Securities LLC

Adv. Pro. No. 08-01789 (SMB)

**CERTAIN CUSTOMER-CLAIMANTS JOINTLY
REPRESENTED BYLAX & NEVILLE LLP**

Customer-Claimant	BLMIS Account Number	Claim Number	Docket Number of Objection to Claim Determination
Mary Albanese IRA	1ZR260	002227	734
Dominick Albanese Trust Acct B	1A0101	002155	735
David Belosa & Bari Belosa J/T WROS	1B0196	001085	2789
Gordon Bennett 1988 Trust	1B0099	13917	466
Watershed Foundation	1ZA197	013913	1015
Harriet Bergman	1B0197	000282	2388
Leonard Bergman Credit Shelter Trust FBO Harriet Bergman	1B0272	000518	2451
Adriane Biondo	1ZA482	012132/013771	3708
Audrey and Robert Orenbach	1ZA482	013773/13497	3706
Mildred Wang	1ZA482	012122/13527	3707
Shelly Roth, Ira Roth, Alexander Roth, Evan Roth, Jordan Roth	1ZA482	013500/013772	3705
Brow Family Partnership	1ZA482	13499	2282
Carol Bulman (IRA)	1ZR006	004913	904
William Jay Cohen, Trustee	1ZA232	009570	725
Elinor P. Cohen Trustee Dated 11/14/89 FBO Eleanor P. Cohen	1ZB381	009607	726
Coronado S A	1FN015	933	2386
Coronado S A	1FR023	2126	3108
Jacob Davis and Marilyn Davis, Trustees	1D0051	010615	2358
Jacob Davis IRA	1ZR008	010610	786
Marilyn Davis & Jacob Davis ttees UTA by Marilyn Davis	1ZA052	10613	2830
Karl Drobitsky	1D0050	004124	2786
Richard Eaton IRA	1CM366	013916	840
Fammad LLC	1F0201	012126	787
Myron Feuer IRA	1F0173	000165	441

Peds Retirement Trust	1P0085	5625	906
PJFN Investors LP	1ZA081	008177	927
Selma Fox IRA	1ZW045	001455	737
Jerome Fox IRA	1ZW017	001458	736
Fox Family Partnership LLC	1ZB478	001609	1037
Accu Plan Employees' Profit Sharing Trust	1A0083	8504	2387
Constance Friedman	1F0098	8505	2880
Allan Robert Greene	1ZB462	002525	375
Julia Greene, Allen Robert Greene as custodian	1ZA919	002708	664
Bruce Hector MD	1ZA317	000615	782
Jay M. Izes IRA	1ZR311	011734	2035
Dori Kamp	1ZR086	001387	1992
Howard L. Kamp	1ZR257	001403	714
Abe Kleinman IRA	1ZR165	12234	1991
Bonnie Kansler IRA	1ZR170	12199	788
Dale Kleinman	1ZA993	012198	795
Marjorie Kleinman	1ZA992	6338	740
Matthew Kansler	1ZB420	012197	739
Deborah Kaye	1ZA364	9124	2510
Elliott Kaye	1ZA316	002548	783
Lawrence Kaye Trustee Evelyn Kaye Trust FBO Judith Knight et al.	1K0121	009126	N/A
Lawrence Kaye & Susan Kaye Trustees	1K0122	009106	2813
Lawrence Kaye IRA	1K0142	008400	374
Paul Kaye	1K0200	9107	2447
Robert Kehlmann Trustee, Trust FBO Ephraim Kehlmann U/A DTD 12/30/72	1ZA710	008636	802
Robert Kehlmann and Diana Tosto Kehlmann	1ZA708	008634	800
Robert Kehlmann Trustee Tst UW William Kehlmann 1/23/65	1ZA709	008637	801
Zipora Wagreich Trustee U/A Dtd 11/6/90	1ZB096	8635	871
Donald S. Kent	1K0160	012920	791
Madeline R. Kent Living Trust	1EM098	012919	2398
Sheila Kolodny	1K00042	003348	2823
Sheila Kolodny	1K0132	3349	2440
The Korn Family Limited Partnership	1CM704	013971	910
Robert Korn Revocable Trust	1CM382	013914	465

Donna Lefkowitz Revocable Trust dtd 12/13/04	1ZA966	001099	839
Laurence E. Leif IRA	1L0139	458	2825
Rose Less	1ZB293	2402	713
Ruth Mechaneck	1ZB506	838	2792
The Mechaneck Rev Liv Trust DTD 5/11/94	1ZA413	001026	1772
Harriet K. Meiss Trust	1ZA465	15098	666
Morse Family Foundation Inc.	1M0177	008401	543
Linda Morese Revocable Trust dated 6/18/93	1M0167	009369	2110
John Maccabee & Sherry More Maccabee Living Trust Dated 1/24/97	1M0002	010609	2989
The HO Marital Appointment Trust, Michael Oshry, Suzanne Oshry & Meryl Evans Co-Trustees	1ZB495	13537	879
White Orchard Investments, Ltd	1FR088	011597	3279
Harry Pech and Jeffrey Pech J/T WROS	1P0083	4201	1867
Lanny Rose	1ZA101	000139	599
JIR Enterprises LLC	1J0060	11572	2471
Kenneth E. Roth	1R0213	4000	2514
Elaine C. Schlessberg Trust Dated 8/26/2004	1S0312	000382	793
Norman Schlessberg Trust/Trustee	1S0313	000152	2436
Robert L. Schwartz 2004 Revocable Trust Agreement	1S0227-3	0160611	464
Anne Squadron IRA	1S0234	002909	3000
Anne Strickland Squadron	1S0478	004783	2966
Alana D. Gold		0066887	3685
Alexander Squadron		006875	3692
Anna Rothwell		006894	3700
Arthur and Eleanor Squadron			3694
William Squadron and Debra Lagapa		006873	3701
Catherine Shea		006883	3688
Daniel Squadron		006872	3698
Elena Prohaska Glinn		006896	3697
Elizabeth Shea		006881	3698
Eric Grode and Elizabeth Harre		006891	3696
Sarah B. Harre		006892	3699
Swing and David Harre		006889	3682

Jacob Squadron		006874	3691
Justin Shea		006882	3690
Laurel Squadron		006878	3704
Michael and Marcy Squadron		006888	3686
Neill P. Squadron		006879	3703
Pasquale and Marianna Bernardin		006890	
Peter and Carol Gold		006885	3695
Richard Squadron and Theodosia Price		006877	
Robert Vas Dias and Margaret Butcher		006895	3702
Samuel Squadron		006876	3693
Sarah D. Gold		006886	3683
Seth and Elizabeth Squadron		006871	3687
Vanessa Gang		006893	
Angelo Viola	1ZA297	001100	868
Angelo Viola IRA	1ZR232	001101	869
David T. Washburn	1W0087	013526	2281
David T. Washburn IRA	1W0088	13523	2281
Laura Weill	1CM334	1516	2183
Bette Wilkes	1CM865	012107	3237
Jennie Wilkes	1CM865	012134	3237
Samuel Wilkes	1CM865	012143	3237
Stephen Wilkes	1CM865	012182	3237
Alan Goldstein IRA	1CM450	008197	404
Stephen Weissner	1ZB435	00017	
Barbara L. Laird c/o Roger Williams	1ZA365	8623	2474
Roger Williams and Miriam L. Williams	1ZA886	008618	415